

FILE NO. 10416
TAMIKA N. WYCHE, ESQUIRE
LAW OFFICES OF DAVID PAUL DANIELS, LLC
2985 Yorkship Square, Suite 1A
Camden, New Jersey 08104
(856) 338-0411
TW 006502006

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: STEVEN E. BROWN

CASE NO.: 20-11303 ELF

CHAPTER 13

CERTIFICATION IN OPPOSITION TO
MOTION FOR RELIEF FROM THE AUTOMATIC STAY
FILED BY NISSAN MOTOR ACCEPTANCE CORP.

I, Steven E. Brown, Debtor, hereby certify:

1. I filed for protection under 11 U.S.C. Chapter 13 on March 2, 2020.
2. Nissan Motor Acceptance filed a motion for relief from the automatic stay for failure to make all post-petition auto payments.
3. I have made all post petition payments through Western Union and should be post petition current.
4. Currently, I am in the process of looking for the money order receipts to substantiate the payments that I have made.
5. I am also currently in the process of trying to get Western Union to send me proof of payments for the receipts that I cannot find.
6. Until I am able to retrieve proof of the payments that I've made, I would like to cure the delinquent amount over a period of 6 months.
7. I am also in position to make my August payment timely.
8. This certification is being made in an effort to resolve the issues raised by Nissan Motor Acceptance in its motion.

I certify that the foregoing statements are true and correct. I understand that if any statement is willfully false I am subject to punishment.

Dated: August 11, 2020

Respectfully submitted,

BY: /s/ Steven E. Brown
STEVEN E. BROWN, DEBTOR